ENTSORGA
sistemi per l'ambiente

Entsorga West Virginia LLC
1979 Eastwood Rd.
WILMINGTON
North carolina 28403
info@entsorga.it
Certified e-mail: entsorga@legalmail.it

July 29, 2011

Mr. James Burlow
Director
Program Implementation and Information Division
Office of Resource Conservation and Recovery 5303P
Environmental Protection Agency
Ariel Rios Building,
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0002

Dear Mr. Burlow:

Entsorga West Virginia LLC (Entsorga) is responding to the additional information that was requested during a telephone call on July 29, 2011 between our consultant, Spectrum Environmental Sciences, Inc. (Spectrum) and Mr. George Faison of your staff. Mr. Faison has requested additional information concerning the manufacturing process and the constituent testing of the fuels that will be implemented as part of the operation of the proposed facility (Facility). Our responses to his request are provided below:

Request: Provide additional information on the process that will be used to ensure it meets the US EPA definition of "process" as provided in 40 CFR 241.2.

Response: The manufacturing of the Entsorga SRF is a four step process and is described below:

- *Reception* – Municipal Solid Waste (MSW) (placed by residents curbside as it is today) will be brought to the Facility by a local hauler. The MSW will be deposited into an indoor aerated reception pit. Air is continuously drawn into the building to avoid odor build-up inside the Facility. There is no combustion or incineration as part of this process.

  The individual MSW materials processed at the Facility are anticipated to include all of the waste currently allowable by local waste haulers (kitchen organic waste, mixed unsorted paper, etc). The excluded waste includes all types of waste that are currently prohibited by the local waste hauler (e.g. hazardous waste, used oil, white goods [appliances] and construction debris).

- *Pre-screening* –MSW will go through an initial screening process using a large rotary drum which will tear open the trash bags and add in the other

MSW not in bags. The large pieces of waste (plastic, paper and cardboard) are separated from the MSW and set aside for use during the refining stage. The remaining waste (including organic waste) is referred to as "underscreen" materials and is smaller in size and goes directly to the stock pit. An air circulation system is used to ensure rapid composting of the waste. The air circulation system blows warm air through the waste in order to quickly start up the aerobic composting fermentation process.

- *Biological treatment (oxidation/composting)* – The underscreen material is placed on a pre-fabricated concrete floor which contains slots through which processed air is moved. The processed air is a controlled combination of fresh air and re-circulated warm air which ensures a consistent breakdown of the waste. This reduces the amount of water in the material leading to a dry paper-like product. There is no combustion or incineration in this process.
- *Refining* – The large pieces of waste (plastic, paper and cardboard) are reintroduced to the process at this point. Using rotary screens, air separators and magnetic/infrared technology the material is further separated to remove any metals and PVC plastics that may remain. Metals will be sent to the County Recycling Center on Grapevine Road. The PVC plastics will be sent to the local landfill. The product is then shredded into smaller pieces resulting in a product that can be used as an alternate fuel replacing traditional fuels, such as coal and petroleum coke.

Request: Provide information as to how the final fuel product will be tested to ensure that the constituents/contaminants are not higher than traditional fuels.

Response: Entsorga WV LLC has developed a rigorous Quality Assurance Program (QAP) to ensure that the final fuel specification meets the requirements of the customer (including caloric requirements and contaminant limitations). The following inspections and testing will be completed under the QAP:

1. Daily visual inspections of all incoming MSW will be conducted to ensure that the excluded items listed above are not included in the fuel ingredient stream.
2. Daily calorific analysis will take place to ensure that the fuel produced meets the specifications of the customer.
3. Quarterly compositional analysis will be conducted on composite grab samples collected monthly throughout the quarter. The analysis will include calorific analysis and as well a contaminant analysis including the following chemical constituents:

Antimony	Beryllium
Arsenic	Cadmium
Benzene	Chlorine

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Chromium	Nickel
Cobalt	Phosphorus
Lead	Selenium
Manganese	Toluene
Mercury	

If you have other questions regarding our request for a Comfort Letter, please do not hesitate to contact me directly (910-616-2993).

Sincerely,

Pietro Cella Mazzariol
Principal Officer
Entsorga WV LLC.